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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION VII  
726 Minnesota Avenue  
KANSAS CITY KS 66101



FACSIMILE REQUEST AND COVER SHEET

PLEASE PRINT IN BLACK INK ONLY

TO

Tom Pauling

OFFICE/PHONE

(314) 751-1080

REGION/LAB

FROM

John Smith

PHONE

(913) 236-2888

MAIL CODE

OFFICE

DATE

10/11/88

NUMBER OF PAGES TO INCLUDE THIS COVER SHEET

2

Please number all pages

INFORMATION FOR SENDING FACSIMILE MESSAGES

EQUIPMENT

FACSIMILE  
NUMBER

VERIFICATION  
NUMBER

RAPICOM 3300

FTS: 757-2845 (auto)  
Comm: (913) 236-2845

FTS: 757-2827, Ext 211  
Comm: (913) 236-2827,  
Ext 211



R00105800  
RCRA RECORDS CENTER

## Monsanto

If tetrachloroethylene is to remain a POHC, then the Modified Method 5 (MM5) Sampling Train must be used simultaneously with the VOST. The VOST is designed for compounds with boiling points between  $30^{\circ}\text{C}$  and  $100^{\circ}\text{C}$ , while the MM5 Train is designed for compounds with boiling points greater than  $100^{\circ}\text{C}$ .

~~Although Performance audits of the VOST have shown that acceptable ranges of accuracy can be achieved for tetrachloroethylene, we have seen no data which suggests it is more effective than the MM5 sampling train for tetrachloroethylene.~~

Furthermore, sampling <sup>with</sup> both trains will enable Monsanto to run a complete scan of both volatile and semi-volatile compounds, <sup>which</sup> ~~this~~ will provide valuable information concerning the formation of products of incomplete combustion (PICs). <sup>defending</sup> ~~This information~~ will be extremely important in ~~setting~~ incinerator permit operating conditions. As of yet, we have no information concerning the carbon monoxide (CO) emissions from the unit, and therefore, no indication of operating combustion efficiency. It is possible for an incinerator to operate at poor combustion efficiencies (high CO) and still pass the required destruction and removal efficiency (DRE). In these cases PIC emissions can pose a significant threat to human health and the environment. Given Monsanto's urban location, any potential threat to human health is magnified.

The absence of an indication of semi-volatile <sup>could</sup> PIC emission data, coupled with poor combustion efficiency, ~~may~~ result in Monsanto conducting a second trial burn even if DREs are met.

## ~~Performance~~

Both the VOST and the MM5 have been evaluated for tetrachloroethylene. Both trains are adequate. However, the MM5 is probably more accurate.

CO cutoff

